

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153-0119

**Exhibit G**

**Order Granting Motion to Consolidate**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Eric A. Grasberger (admitted *pro hac vice*)  
(eric.grasberger@stoel.com)  
Mario R. Nicholas (SBN 273122)  
(mario.nicholas@stoel.com)  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Tel: 503 224 3380  
Fax: 503 220 2480

*Attorneys for Plaintiff/Counter-Defendant  
JH Kelly, LLC*

**FILED**

MAY 05 2020

CLERK OF THE SUPERIOR COURT  
BY: M. YOCOM, DEPUTY CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SHASTA

JH KELLY, LLC, a Washington limited  
liability company,

Plaintiff,

v.

AECOM TECHNICAL SERVICES, INC., a  
purported California corporation, and DOES 1  
through 10, inclusive,

Defendants.

JH KELLY, LLC,

Plaintiff,

v.

PACIFIC GAS & ELECTRIC COMPANY and  
DOES 1 through 10, inclusive,

Defendants.

Case No. 192600 (*Proposed Lead Case*)  
Case No. 191759 (*JH Kelly, LLC v. Pacific Gas  
& Electric Company, et al.*)

**[PROPOSED] ORDER GRANTING  
MOTION TO CONSOLIDATE**

Date Action Filed: Jan. 29, 2019  
(Case No. 192600);  
Jan. 25, 2019

Trial Date: (Case No. 191759)  
July 28, 2019  
(Case No. 192600);  
TBD  
(Case No. 191759)

**[PROPOSED] ORDER**

**IT IS HEREBY ORDERED**, pursuant to the Stipulation by all Parties, as follows:

1. The following actions should be consolidated for all purposes, including discovery, pretrial proceedings and trial:

a. **Lead action** *JH Kelly, LLC, v. AECOM Technical Services, Inc., and Does 1 through 10, inclusive*, Case No. 192600;

b. *JH Kelly, LLC v. Pacific Gas & Electric. Co. and Does 1 through 10, inclusive*, Case No. 191759.

2. Pursuant to California Rules of Court, Rule 3.350(d) documents filed in the consolidated case shall include the following case number: 192600 [consolidated with: 191759].

**IT IS FURTHER ORDERED:** *The trial date of July 28, 2020 in case no. 192600 is vacated. The Resolution Review hearing re: Status of bankruptcy set for June 22, 2020 at 9:00am. will be re-set for Dept-8 for Status of removal.*

DATED: *5/27/2020*

*[Signature]*  
JUDGE OF THE SUPERIOR COURT

## DECLARATION OF SERVICE

I declare that I am over the age of eighteen years and not a party to this action. I am employed in the City of Portland and County of Multnomah and my business address is 760 SW Ninth Avenue, Suite 3000, Portland, Oregon 97205.

On April 2, 2020, at Portland, Oregon, I served the attached document(s): **[PROPOSED] ORDER GRANTING MOTION TO CONSOLIDATE** on the following parties:

Stanley J. Terry (PHV) (Attorney)	<a href="mailto:terry@carneylaw.com">terry@carneylaw.com</a>
Elliott C. Copenhaver (Attorney)	<a href="mailto:copenhaver@carneylaw.com">copenhaver@carneylaw.com</a>
Patti Saiden (Legal Asst.)	<a href="mailto:saiden@carneylaw.com">saiden@carneylaw.com</a>
Ann Durkin (Legal Asst.)	<a href="mailto:durkin@carneylaw.com">durkin@carneylaw.com</a>

Carney Badley Spellman, P.S.

Robert M. Harding (Attorney)	<a href="mailto:RHarding@ckpf.com">RHarding@ckpf.com</a>
Randy C. Nelson (Attorney)	<a href="mailto:RNelson@ckpf.com">RNelson@ckpf.com</a>
Patrick M. Hensleigh (Attorney)	<a href="mailto:PHensleigh@ckpf.com">PHensleigh@ckpf.com</a>
Randi Diem (Legal Asst.)	<a href="mailto:Rdiem@ckpf.com">Rdiem@ckpf.com</a>

Carr, Kennedy, Peterson & Frost

Attorneys for Defendant/Cross-  
Complainant AECOM Technical Services,  
Inc

Ralph Collins (Attorney)	<a href="mailto:ralph.collins@rswslaw.com">ralph.collins@rswslaw.com</a>
Ian Collins (Attorney)	<a href="mailto:ian.collins@rswslaw.com">ian.collins@rswslaw.com</a>
Kathy Williams (Legal Asst.)	<a href="mailto:kathy.williams@rswslaw.com">kathy.williams@rswslaw.com</a>

Reese, Smalley, Wiseman & Schweitzer,  
LLP

Co-Counsel for Plaintiff JH Kelly, LLC

Aaron Gruber (Attorney)	<a href="mailto:agruber@rallsgruber.com">agruber@rallsgruber.com</a>
Ralls Gruber & Niece	
1700 S. El Camino Real, Suite 150San	
Mateo, CA 94402	

Attorneys for Defendant Pacific Gas and  
Electric Company

☒ **BY EMAIL:** Pursuant to the email service agreement between the parties, on the date written above, I emailed a copy of the attached documents to the addressee, as shown on the service list above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on April 2, 2020, at Portland, Oregon.

*s/Ana Trask*  
\_\_\_\_\_  
Ana Trask



Eric A. Grasberger (admitted *pro hac vice*)  
 (eric.grasberger@stoel.com)  
 Mario R. Nicholas (SBN 273122)  
 (mario.nicholas@stoel.com)  
 STOEL RIVES LLP  
 760 SW Ninth Avenue, Suite 3000  
 Portland, OR 97205  
 Tel: 503 224 3380  
 Fax: 503 220 2480

*Attorneys for Plaintiff/Counter-Defendant*  
*JH Kelly, LLC*

**FILED**

**MAY - 5 2020**

CLERK OF THE SUPERIOR COURT  
 BY: M. BORNE, DEPUTY CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 FOR THE COUNTY OF SHASTA

JH KELLY, LLC, a Washington limited  
 liability company,

Plaintiff,

v.

AECOM TECHNICAL SERVICES, INC., a  
 purported California corporation, and DOES 1  
 through 10, inclusive,

Defendants.

JH KELLY, LLC,

Plaintiff,

v.

PACIFIC GAS & ELECTRIC COMPANY and  
 DOES 1 through 10, inclusive,

Defendants.

Case No. 192600 (*Proposed Lead Case*)  
 Case No. 191759 (*JH Kelly, LLC v. Pacific Gas  
 & Electric Company, et al.*)

**STIPULATION AND [PROPOSED]  
 ORDER TO CONSOLIDATE**

**FILED BY FAX**

Date Action Filed: Jan. 29, 2019  
 (Case No. 192600);  
 Jan. 25, 2019  
 (Case No. 191759)  
 Trial Date: July 28, 2019  
 (Case No. 192600);  
 TBD  
 (Case No. 191759)

IT IS HEREBY STIPULATED, by and between the Parties (as herein defined), as  
 follows:

WHEREAS, multiple lawsuits have arisen out of a private construction project generally  
 known as the "Burney K2 Replacement Project" (the "**Project**"), including the following:

1. This case, the lead action, *JH Kelly, LLC, v. AECOM Technical Services, Inc., and Does 1 through 10, inclusive*, Case No. 192600, the parties hereto being as follows:

a. JH Kelly, LLC, a Washington limited liability company ("**JH Kelly**"), as Plaintiff and Counter-Defendant, and AECOM Technical Services, Inc., a California corporation ("**AECOM**"), as Defendant and Counter-Complainant. For the avoidance of doubt, reference to Case No. 192600 is inclusive of JH Kelly's complaint against AECOM and AECOM's cross-complaint against JH Kelly.

2. *JH Kelly, LLC v. Pacific Gas & Electric Co. and Does 1 through 10, inclusive*, Case No. 191759, the parties thereto being as follows:

a. JH Kelly, as Plaintiff, and Pacific Gas & Electric Company, an investor-owned utility headquartered in San Francisco, California ("**PG&E**"), as Defendant.

WHEREAS, the parties listed above under subpart a. of each paragraph nos. 1 through 2 are collectively referred to herein as the "**Parties.**"

WHEREAS, Exhibits A and B hereto are caption pages for each of the actions listed above, and Exhibits A-1 and B-1 hereto list all named parties in each action, whether or not each has appeared, and the names of their respective attorneys of record (California Rules of Court, Rule 3.350);

WHEREAS, consolidation of actions is appropriate where the actions involve common questions of law and fact, and where consolidation will promote judicial efficiency and economy (Cal. Code Civ. Proc., § 1048);

WHEREAS, the foregoing actions involve common questions of law and fact relating to the Project;

WHEREAS, consolidation of the actions will promote judicial efficiency and economy, in that it will reduce the necessity for duplicative discovery, pretrial proceedings, and trial hearings

1 relating to the same or closely-related facts;

2 WHEREAS, in the jointly administered bankruptcy cases of *In re PG&E Corp. & Pacific*  
3 *Gas & Electric Co.*, Case No. 19-30088, pending in the Northern District of California  
4 Bankruptcy Court (the “**Chapter 11 Cases**”), the Bankruptcy Court for the Northern District of  
5 California has modified the automatic stay for the sole purpose of allowing the Parties to seek  
6 consolidation in this Court of these two actions, and in all other respects the automatic stay  
7 remains in effect; and

8 WHEREAS, upon this Court’s consolidation of the actions, the Parties have agreed (and  
9 have advised the Bankruptcy Court, in which AECOM currently has claims that relate to and  
10 overlap with the actions pending in this Court) that PG&E will remove the consolidated actions to  
11 the Bankruptcy Court so that the actions may be adjudicated as to all Parties in a single forum;

12 THEREFORE, IT IS HEREBY STIPULATED by the Parties through their undersigned  
13 counsel of record that the foregoing actions should be consolidated for all purposes, including  
14 discovery, pretrial proceedings and trial. The Parties request that the Court issue the proposed  
15 Order attached as Exhibit C hereto and separately lodged herewith (Local Rules of the Court,  
16 Rule 5.06).

17 SO STIPULATED.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 DATED: April 2, 2020

2  
3 By: 

4 Eric A. Grasberger  
5 Mario R. Nicholas  
6 Attorneys for Plaintiff and Counter-Defendant  
7 JH Kelly, LLC

8 DATED: April 2, 2020

9 By: 

10 S. Jay Terry  
11 Attorneys for Defendant and Counter-Claimant  
12 AECOM Technical Services, Inc.

13 DATED: April 2, 2020

14 By: *s/Aaron Gruber* 

15 Aaron Gruber  
16 Attorneys for Defendant Pacific Gas &  
17 Electric Company  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SHASTA

JH KELLY, LLC, a Washington limited  
liability company,

Plaintiff,

v.

AECOM TECHNICAL SERVICES, INC., a  
purported California corporation; and  
DOES 1 through 10, inclusive,

Defendants.

CASE NO. 192600

EXHIBIT A-1

The named parties, whether each has appeared, and the names of respective attorneys of record in *JH Kelly, LLC, v. AECOM Technical Services, Inc., and Does 1 through 10, inclusive*, Case No. 192600:

1. Plaintiff and Counter-Defendant JH Kelly, LLC, a Washington limited liability company;

a. has appeared;

b. attorneys of record:

Eric A. Grasberger (admitted *pro hac vice*)  
(eric.grasberger@stoel.com)  
Mario R. Nicholas (SBN 273122)  
(mario.nicholas@stoel.com)  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Tel: 503 224 3380  
Fax: 503 220 2480

2. Defendant and Counter-Complainant AECOM Technical Services, Inc., a California corporation;

a. has appeared;

b. attorneys of record:

C. Scott Penner (SBN 124826)  
S. Jay Terry (admitted *pro hac vice*)  
Elliot C. Copenhaver (admitted *pro hac vice*)  
CARNEY BADLEY SPELLMAN, P.S.  
701 Fifth Avenue, Suite 3600  
Seattle, WA 98104-7010  
Tel: 206 622 8020

Robert M. Harding (SBN 101751)  
Randall C. Nelson (SBN 138298)  
CARR, KENNEDY, PETERSON & FROST  
420 Redcliff Drive  
Redding, CA 96002  
Tel: 530 222 21000

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SHASTA

JH KELLY, LLC, a Washington limited  
liability company,

CASE NO. 191759

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,  
a purported California corporation; and  
DOES 1 through 10, inclusive,

Defendants.

**EXHIBIT B-1**

The named parties, whether each has appeared, and the names of respective attorneys of record in *JH Kelly, LLC v. Pacific Gas & Electric Co. and Does 1 through 10, inclusive*, Case No. 191759:

1. Plaintiff JH Kelly, LLC, a Washington limited liability company;

c. has appeared;

d. attorneys of record:

Mario R. Nicholas (SBN 273122)  
(mario.nicholas@stoel.com)  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Tel: 503 224 3380  
Fax: 503 220 2480

2. Defendant Pacific Gas & Electric Company, an investor-owned utility headquartered in San Francisco, California;

a. appearing now for the limited purpose of stipulating to this consolidation;

b. attorneys of record:

Aaron Gruber (SBN 209509)  
(agruber@rallsgruber.com)  
RALLS GRUBER & NIECE  
1700 S. El Camino Real, Suite 150  
San Mateo, CA 94402  
Tel: 620 458 4040  
Fax: 620 240 2250



**[PROPOSED] ORDER**

**IT IS HEREBY ORDERED**, pursuant to the Stipulation by all Parties, as follows:

1. The following actions should be consolidated for all purposes, including discovery, pretrial proceedings and trial:

a. **Lead action** *JH Kelly, LLC, v. AECOM Technical Services, Inc., and Does 1 through 10, inclusive*, Case No. 192600;

b. *JH Kelly, LLC v. Pacific Gas & Electric. Co. and Does 1 through 10, inclusive*, Case No. 191759.

2. Pursuant to California Rules of Court, Rule 3.350(d) documents filed in the consolidated case shall include the following case number: 192600 [consolidated with: 191759].

**IT IS FURTHER ORDERED:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

DATED: \_\_\_\_\_

\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT

**DECLARATION OF SERVICE**

I declare that I am over the age of eighteen years and not a party to this action. I am employed in the City of Portland and County of Multnomah and my business address is 760 SW Ninth Avenue, Suite 3000, Portland, Oregon 97205.

On April 2, 2020, at Portland, Oregon, I served the attached document(s):  
**STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE** on the following parties:

Stanley J. Terry (PHV) (Attorney)  
 Elliott C. Copenhaver (Attorney)  
 Patti Saiden (Legal Asst.)  
 Ann Durkin (Legal Asst.)

[terry@carneylaw.com](mailto:terry@carneylaw.com)  
[copenhaver@carneylaw.com](mailto:copenhaver@carneylaw.com)  
[saiden@carneylaw.com](mailto:saiden@carneylaw.com)  
[durkin@carneylaw.com](mailto:durkin@carneylaw.com)

Carney Badley Spellman, P.S.

Robert M. Harding (Attorney)  
 Randy C. Nelson (Attorney)  
 Patrick M. Hensleigh (Attorney)  
 Randi Diem (Legal Asst.)

[RHarding@ckpf.com](mailto:RHarding@ckpf.com)  
[RNelson@ckpf.com](mailto:RNelson@ckpf.com)  
[PHensleigh@ckpf.com](mailto:PHensleigh@ckpf.com)  
[Rdiem@ckpf.com](mailto:Rdiem@ckpf.com)

Carr, Kennedy, Peterson & Frost

Attorneys for Defendant/Cross-  
 Complainant AECOM Technical Services,  
 Inc

Ralph Collins (Attorney)  
 Ian Collins (Attorney)  
 Kathy Williams (Legal Asst.)

[ralph.collins@rswslaw.com](mailto:ralph.collins@rswslaw.com)  
[ian.collins@rswslaw.com](mailto:ian.collins@rswslaw.com)  
[kathy.williams@rswslaw.com](mailto:kathy.williams@rswslaw.com)

Reese, Smalley, Wiseman & Schweitzer,  
 LLP

Co-Counsel for Plaintiff JH Kelly, LLC

Aaron Gruber (Attorney)  
 Ralls Gruber & Niece  
 1700 S. El Camino Real, Suite 150 San  
 Mateo, CA 94402

[agruber@rallsgruber.com](mailto:agruber@rallsgruber.com)

Attorneys for Defendant Pacific Gas and  
 Electric Company

☒ **BY EMAIL:** Pursuant to the email service agreement between the parties, on the date written above, I emailed a copy of the attached documents to the addressee, as shown on the service list above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on April 2, 2020, at Portland, Oregon.

\_\_\_\_\_  
 s/Ana Trask  
 Ana Trask